

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

VANDERBILT UNIVERSITY,	)	
	)	Civil Action No. 3:18-cv-00046
<i>Plaintiff,</i>	)	
	)	Judge Campbell
V.	)	Magistrate Judge Frensley
	)	
SCHOLASTIC, INC.; HOUGHTON MIFFLIN	)	JURY DEMAND
HARCOURT PUBLISHING COMPANY; and	)	
TED S. HASSELBRING,	)	
	)	
<i>Defendants.</i>	)	

**JOINT MOTION OF VANDERBILT AND HOUGHTON MIFFLIN HARCOURT  
FOR ADDITIONAL EXTENSION OF DEADLINE TO BRING FACT DISCOVERY  
MOTIONS**

Plaintiff Vanderbilt University (“Vanderbilt”) and Defendant Houghton Mifflin Harcourt Publishing Company (“HMH”) jointly move the Court to enter an Order allowing either Vanderbilt or HMH until February 28, 2020 to bring a discovery motion against the other in this matter and for grounds state as follows.

1. On February 10, 2020, Vanderbilt and HMH filed a joint motion for an extension of the deadline until February 13, 2020 for either to bring fact discovery motions against the other in order to give themselves time to resolve several outstanding discovery issues without involving the Court.
2. On February 11, 2020, the Court granted the joint motion.
3. On February 13, 2020, Vanderbilt and HMH filed a second joint motion for an extension of the deadline until February 18, 2020 for either to bring fact discovery motions against the other in order to give themselves additional time to resolve several outstanding discovery issues without involving the Court.

4. On February 14, 2020, the Court granted the second joint motion.
5. Vanderbilt and HMH have continued to make progress on a consensual resolution of, but have not fully resolved, all of these outstanding issues.
6. In order to give Vanderbilt and HMH some additional time to try to fully resolve these disputes without involving the Court, Vanderbilt and HMH respectfully request an extension until February 28, 2020 for either to bring a fact discovery motion concerning these outstanding issues.

For the foregoing reasons, Vanderbilt and HMH respectfully request that the Court grant this joint motion to allow both Vanderbilt and HMH until February 28, 2020 to bring fact discovery motions in this matter against the other.

Dated: February 18, 2020

RESPECTFULLY SUBMITTED BY:

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**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing has been served upon these individuals, via the Court's CM/ECF e-mail notification system, on this the 18th day of February, 2020:

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